

No. 13-20-00143-CV

**In the Thirteenth Court of Appeals in
Corpus Christi, Texas**

FILED IN
13th COURT OF APPEALS
CORPUS CHRISTI/EDINBURG, TEXAS
7/21/2020 2:43:14 PM

DIANA GARZA, *Appellant*

**KATHY S. MILLS
Clerk**

V.

JOSE OCHOA, *Appellee*

ON APPEAL FROM CAUSE NO. 18-417-D
105TH JUDICIAL DISTRICT COURT OF KLEBERG COUNTY, TEXAS
HON. JACK W. PULCHER, PRESIDING JUDGE

**APPELLEE'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
APPELLEE'S BRIEF**

TO THE HONORABLE THIRTEENTH COURT OF APPEALS:

Appellee Jose Ochoa files this motion for extension of time to file his Appellee's Brief. Appellee respectfully requests a thirty (30) day extension of time to file his brief under TEX. R. APP. P. 38.6(d).

Appellee Jose Ochoa's brief is currently due on July 22, 2020. Appellant's brief was filed on June 22, 2020, after one (1) extension was granted. Appellee requests a thirty (30) day extension of time to file his Appellee's Brief, making the brief due on August 21, 2020.

This is Appellee's first motion for extension of time to file his responsive brief.

The undersigned counsel conferred with Randall E. Turner, who is not opposed to the relief requested in this motion.

The undersigned counsel is lead counsel for Appellee Jose Ochoa and has the sole responsibility for preparing Appellee's Brief. Counsel requires additional time to complete an appropriate response to the Brief of the Appellants in an organized and efficient matter. Appellee's counsel has been unable to complete the brief at issue because the logistics of the covid-19 pandemic have interfered with the ability of the undersigned to have the brief completely prepared in a timely manner. There should be no problem completing the brief within the next 30 days.

This request for an extension is not sought for purposes of delay but so that Appellee's argument and authorities may be presented to this court in an efficient, attractive and persuasive manner.

For the reasons stated herein, Appellee respectfully requests and prays that this court grant this request for a thirty (30) day extension, making Appellee's brief due on August 21, 2020 and for such other further relief to which this Appellee may be justly entitled.

Respectfully submitted,



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CERTIFICATE OF CONFERENCE

I certify that on the 21st day of July 2020, I conferred with Randall E. Turner, counsel for Appellant Diana Garza who does not oppose the relief requested in this motion.

CERTIFICATE OF SERVICE

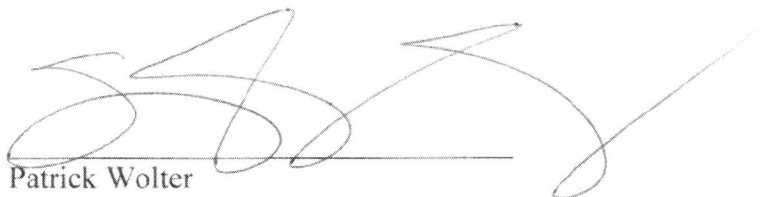
I hereby certify that a true and correct copy of the above and foregoing pleading has been forwarded by E-filing and Telecopier to the parties listed below on this the 21st day of July 2020.

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